

**BLANK ROME LLP**

1271 Avenue of the Americas

New York, NY 10020

Telephone: (212) 885-5000

Facsimile: (212) 885-5001

Jeffrey Rhodes (*admitted pro hac vice*)

Evan J. Zucker

*Attorneys for Kin Properties, Inc.; Aleff LLC; Arcolo  
Limited Partnership; Cansan Company, LLC; Fairsan  
Company LLC; Floreff LLC; Fundamentals Co LLC;  
Hareff LLC; Hillsborough Associates; Pasan Trust;  
Mantkin LLC; Musue LLC; Nathan Alison LLC;  
Sugencole LLC; Sugengran LLC; and Sugensteve LLC*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
<b>In re:</b>	:	<b>Chapter 11</b>
	:	
<b>SEARS HOLDINGS CORPORATION, <i>et al.</i>,</b>	:	<b>Case No. 18-23538 (RDD)</b>
	:	
<b>Debtors.<sup>1</sup></b>	:	<b>(Jointly Administered)</b>
	:	
-----	X	

**NOTICE OF WITHDRAWAL  
OF OBJECTIONS OF THE KIN LANDLORDS**

**PLEASE TAKE NOTICE** that pursuant to a resolution reached among the applicable parties, Kin Properties, Inc.; Aleff LLC; Arcolo Limited Partnership; Fairsan Company LLC; Floreff LLC; Fundamentals Co LLC; Hareff LLC; Hillsborough Associates; Pasan Trust; Musue

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

LLC; Sugencole LLC; Sugengran LLC; and Sugensteve LLC (collectively, the “Kin Landlords”)

hereby withdraw the following objections:

- a) Objection and Reservation of Rights of the Kin Landlords with Respect to Proposed Global Asset Sale Transaction and Notice of Cure Amounts and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases [Docket No. 1930]
- b) Objection and Reservation of Rights of the Kin Landlords with Respect to Initial and Supplemental Notices of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Global Sale Transaction [Docket No. 2261]
- c) Objection and Reservation of Rights of the Kin Landlords with Respect to Third Supplemental Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Global Sale Transaction [Docket No. 2809]
- d) Supplemental Objection of the Kin Landlords with Respect to Notice of Assumption and Assignment of Additional Designatable Leases [Docket No. 3384]
- e) Supplemental Objection of the Kin Landlords with Respect to Notice of Assumption and Assignment of Fairless Hills Lease [Docket No. 3381]

Dated: New York, New York  
May 7, 2019

**BLANK ROME LLP**

By: /s/ Evan J. Zucker  
Evan J. Zucker  
1271 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 885-5000  
Facsimile: (212) 885-5001  
Email: EZucker@BlankRome.com

and

Jeffrey Rhodes (*admitted pro hac vice*)  
1825 Eye Street NW  
Washington, D.C. 20006  
Telephone: (202) 420-3150  
Facsimile: (202) 420-2201  
E-mail: JRhodes@BlankRome.com

*Attorneys for Kin Properties, Inc.; Aleff LLC; Arcolo Limited Partnership; Cansan Company, LLC; Fairsan Company LLC; Floreff LLC; Fundamentals Co LLC; Hareff LLC; Hillsborough Associates; Pasan Trust; Mantkin LLC; Musue LLC; Nathan Alison LLC; Sugencole LLC; Sugengran LLC; and Sugensteve LLC*